REMARKS/ARGUMENTS

Claim Rejections – 35 U.S.C. § 103(a)

In paragraphs 4-5 of the Final Office Action, the Examiner rejected claims 11, 14 and 16-17 under 35 U.S.C. § 103(a) as being unpatentable over Schutte, et al. (US 6,178,455) in view of Eikeland (US 5,828,837). In the Advisory Action issued April 14, 2004, the Examiner stated that Schutte teaches sending IP addresses between the global processor and the application processors. In previous office actions, the Examiner cited col. 22, lines 25-27 and col. 3, line 65 through col. 4, line 7 for showing this feature. In these cited passages, Schutte discloses a "head end" which dynamically assigns a set of IP addresses to a "cable router or RF modem". The cable router or RF modem responds to requests from "hosts" for IP addresses by sending them IP addresses from the set. (Col. 3, line 65 through col. 4, line 7).

However, it is not at all clear from Schutte whether Schutte's "head end" is the same as the Applicant's "global processor", and whether Schutte's "hosts" are the same as the Applicant's "application processors". The Applicant contends that it would not be obvious to a person skilled in the art to assume that Schutte's head end and hosts (which are utilized in a fixed landline network) are functionally equivalent to the global processor and application processors utilized in the wireless GPRS network in Applicant's claimed invention.

The Examiner also stated in the Advisory Action that Eikeland teaches that the size of the block that is sent to the user is dynamically adjusted according to the amount of traffic while ensuring that a sufficient number of blocks is available to serve all requests. The Examiner cited col. 5, line 62 through col. 6, line 30 for showing this feature. However, the Applicant disagrees for several reasons.

Firstly, Eikeland only seems to disclose reducing the flow rate of *data packets* when there are indications that the network is getting congested. This is accomplished by dynamically adjusting the size of a send-window. (Col. 6, lines 22-30).

There is no suggestion in Eikeland that this flow control process for data packets could be applied to blocks of IP addresses in order to reduce the number of requests for IP addresses received by a global processor in a GPRS network. The flow control

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process in Eikeland is designed to prevent loss of data packets due to congestion in the network. This is an entirely different problem than the problem solved by the claimed invention. As noted, the invention reduces the number of requests for IP addresses received by a global processor in a GPRS network. Eikeland's process of slowing the data rate when congestion is present does not achieve the purpose of the claimed invention.

Secondly, Eikeland does not teach or suggest the balancing performed by the claimed invention between minimizing load on the global processor while ensuring that a sufficient number of blocks is available to serve all requests for additional IP-addresses. The Applicant notes that independent claims 11, 16, and 17 expressly recite, "the size of the *blocks of IP-addresses* in the internal pool of each application processor is dynamically adjusted to minimize the amount of traffic required to request and distribute IP-addresses between the global processor and the application processors *while ensuring that a sufficient number of blocks is available to serve all requests for additional IP-addresses.*" (Emphasis added). Although the Examiner states that Eikeland shows this feature in col. 5, line 62 through col. 6, line 30, it is clearly not there. This balancing feature is not taught or suggested by Schutte and Eikeland. Therefore, the allowance of independent claims 11, 16, and 17 and dependent claim 14 is respectfully requested.

In paragraph 11 of the Office Action, the Examiner rejected claims 12-13 under 35 U.S.C. § 103(a) as being unpatentable over Schutte and Eikeland in view of Wang, et al. (US 6,496,511). Wang is cited for allegedly showing a means to release the IP-address by predefining a customized function. However, the Applicant contends that the combination of Schutte, Eikeland, and Wang still does not establish a *prima facie* case of obviousness with respect to claims 12-13 because the combination does not teach or suggest all the claim limitations. In particular, the combination does not teach or suggest the balancing performed by the claimed invention between minimizing load on the global processor while ensuring that a sufficient number of blocks of IP addresses is available to serve all requests. Claims 12-13 depend from claim 11 and recite further limitations in combination with the novel elements of claim 11. Therefore, the allowance of claims 12-13 is respectfully requested.

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In paragraph 16 of the Office Action, the Examiner rejected claim 15 under 35 U.S.C. § 103(a) as being unpatentable over Schutte and Eikeland in view of Antic, et al. (US 5,561,854). Antic is cited for allegedly showing a method of making back-up copies of the home location register on a persistent storage medium with regular intervals. However, the Applicant contends that the combination of Schutte, Eikeland, and Anitc still does not establish a *prima facie* case of obviousness with respect to claim 15 because the combination does not teach or suggest all the claim limitations. In particular, the combination does not teach or suggest the balancing performed by the claimed invention between minimizing load on the global processor while ensuring that a sufficient number of blocks of IP addresses is available to serve all requests. Claim 15 depends from claim 11 and recites further limitations in combination with the novel elements of claim 11. Therefore, the allowance of claim 15 is respectfully requested.
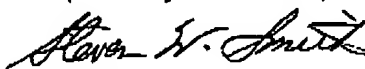
CONCLUSION

In view of the foregoing remarks, the Applicant believes all of the claims currently pending in the Application to be in a condition for allowance. The Applicant, therefore, respectfully requests that the Examiner withdraw all rejections and issue a Notice of Allowance for claims 11-17.

The Applicant requests a telephonic interview if the Examiner has any questions or requires any additional information that would further or expedite the prosecution of the Application.

Respectfully submitted,

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